



**REPORT of
DIRECTOR OF STRATEGY, PERFORMANCE AND GOVERNANCE**

to
**NORTH WESTERN AREA PLANNING COMMITTEE
2 SEPTEMBER 2019**

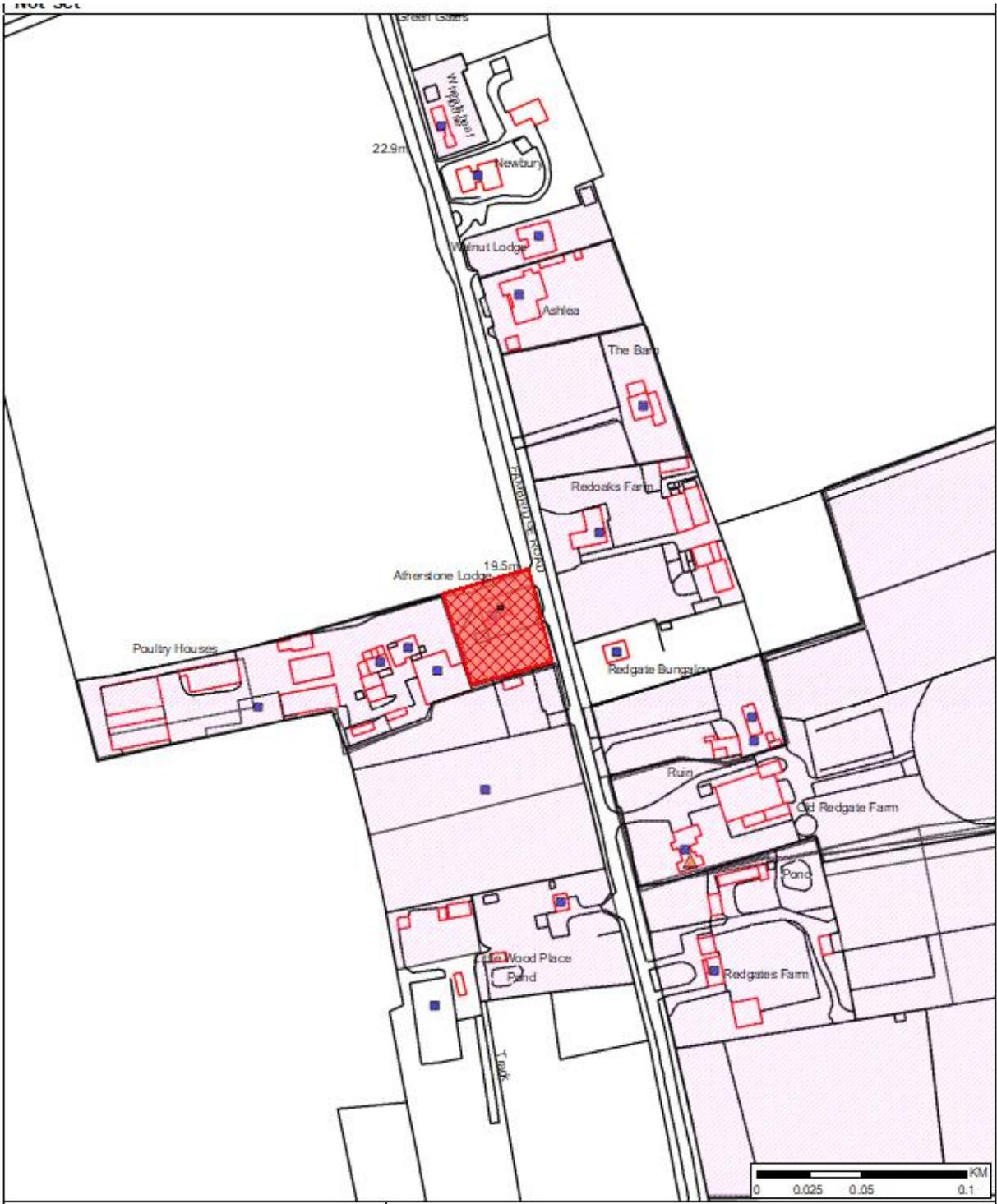
Application Number	OUT/MAL/19/00740
Location	Atherstone Lodge, Fambridge Road, Mundon
Proposal	Outline application, with matters of access, layout, appearance and scale for determination, to demolish chalet bungalow and garage. Erect three pairs of semi-detached houses (6no. dwellings) to provide accommodation for seasonal workers ancillary to the business at rear of site.
Applicant	Mr Paul Scott - Ben Rigby Game Ltd
Agent	Mr Stewart Rowe - The Planning and Design Bureau Ltd
Target Decision Date	05.09.2019
Case Officer	Hannah Bowles
Parish	Purleigh
Reason for Referral to the Committee / Council	Member Call In Councillor Miss Sue White Public interest (neighbours)

1. RECOMMENDATION

REFUSE for the reasons as detailed in Section 9 of this report.

2. SITE MAP

Please see overleaf.



3. SUMMARY

3.1 **Proposal / brief overview, including any relevant background information**

- 3.1.1 The application site is a rectangular parcel of land located on the western side of Fambridge Road, measuring 0.14 hectares. It occupies a low-level dwelling with rooms within the roof space, a detached double garage and its associated residential curtilage. Ben Rigby Game Ltd (described as a meat preparation, packing, storage and distribution premises) operates its business to the rear of the site in agricultural style buildings and the subject land is within the same ownership. The site lies outside of the settlement boundary of Purleigh, in a rural setting. The area is characterised by sporadic agricultural and residential development and open and undeveloped fields.
- 3.1.2 Outline planning permission is sought for the construction of six dwellings in the form of three pairs of the semi-detached houses. The matters of access, scale, layout and appearance are to be considered at this stage, the matter of landscaping has been reserved for consideration at a later date. The dwellings are proposed to be used for seasonal workers in association with the business at the rear of the site.
- 3.1.3 The proposed dwellings would be sited centrally within the plot, in a linear arrangement orientated to face Fambridge Road. The three pairs of semi-detached dwellings would be handed replicas of each other measuring 8.5m in depth, 10.9m in width and would extend 7.5m to the ridge. In terms of appearance a central front facing gable flanked with two small gable roofed dormers are proposed to the front and rear elevations of the proposed dwellings and two pitched roof storm porches are proposed over the front doors. The proposed materials are weatherboarding to the walls and slate roof tiles.
- 3.1.4 It is pertinent to note that an application, within the land as outlined in blue on the location plan (reference FUL/MAL/17/00962), for the retention of the use of land for the stationing of caravans to accommodate temporary workers, ancillary to meat preparation, packing and storage and distribution premises, was refused and dismissed at appeal (November 2018). The application was refused for the following reasons:
- ‘1. The use of caravans for residential purposes has resulted in a form of unsustainable development which, due to its design, siting and layout, is causing demonstrable and detrimental harm upon the character and appearance of the rural area. Thus, the development is in conflict with policies S1, S8, D1, H4 and H7 of the approved Local Development Plan and guidance contained within the National Planning Policy Framework.*
- 2. The close proximity of the caravans to the plant used as part of the commercial use on the site has resulted in a development which is detrimental to the residential amenity of its current and future occupiers. Furthermore, the lack of appropriate amenity space for each unit and the poor layout of the development are causing additional harm in terms of overlooking, overshadowing and overpowering effects upon the amenity of the current and future occupiers of the development. The development is, therefore, contrary to policy S1, D1 and D2 of the approved Maldon District Local Development Plan and the guidance contained within the National Planning Policy Framework.’*

The Inspector for the appeal concluded the following:

- *‘The Council are of the view that the caravans are also an incongruous feature in this rural area. Whilst it is not unusual to find one caravan amongst former agricultural buildings or in the corner of a field, the group of four, in particular, and their residential use, result in a significant and harmful change to the appearance of the rural scene. Although views of them could potentially be screened with new landscaping, this would take time to mature. In addition, the intensity of the use, by virtue of its very nature, harms the sporadic residential character of the area.’*
- *‘I consider that without information about existing accommodation or other options in the area it has not been demonstrated that there is a functional need for the caravans on site. As such, providing the housing on site for the butchers appears to be a convenient solution rather than the result of adequate, prior investigations.’*
- *‘The Planning Practice Guidance advises that circumstances where a temporary planning permission may be appropriate include where a trial run is needed, in order to assess the effect of the development on the area, or where it is expected that planning circumstance will change in a particular way at the end of the period. The appellant’s business is not newly established and, as such, a trial run would serve no purpose and the LP was recently adopted in July 2017.’*

3.1.5 It is also pertinent to note that permission for *‘Demolition of existing bungalow, erection of new retail shop with office and general stores, four two-bedroom flats above including private parking for flats, public parking for shop and new widened access from main road’* was granted in 2013 under reference FUL/MAL/13/00419. This permission has expired and is materially different to the residential development proposed. Therefore, limited weight has been attributed to this previous decision.

3.2 Conclusion

3.2.1 Having taken all material planning considerations into account, including a previously dismissed appeal for a similar proposal on the larger site (as outlined in blue) an objection is raised to the principle of the proposed development. Insufficient evidence and justification in relation to the functional need of the proposed dwellings in the proposed location has been submitted. Further, the layout, scale and appearance of the dwellings are in stark contrast to the development present in the rural area and would significantly and demonstrably harm the character and appearance of the rural area. The proposal is therefore contrary to the guidance contained within the National Planning Policy Framework (NPPF), Policies S1, S8, D1, H7 and H4 of the Maldon District Local Development Plan (MDLDP).

4. MAIN RELEVANT POLICIES

Members’ attention is drawn to the list of background papers attached to the agenda.

4.1 National Planning Policy Framework 2019 including paragraphs:

- 7 Achieving sustainable development
- 11 The presumption in favour of sustainable development
- 47-50 Delivering a sufficient supply of homes
- 102-105 Promoting sustainable transport

- 117-118 Making effective use of land
- 124-128 Achieving well-designed places
- 170-177 Conserving and enhancing the natural environment

4.2 Maldon District Local Development Plan 2014 – 2029 approved by the Secretary of State:

- S1 – Sustainable Development
- S2 – Strategic Growth
- S8 – Settlement boundaries and the Countryside
- D1 – Design Quality and Built Environment
- H1 – Affordable Housing
- H2 – Housing Mix
- H4 – Effective Use of Land
- H7 – Agricultural and Essential Workers Accommodation
- T1 – Sustainable Transport
- T2 – Accessibility

4.3 Relevant Planning Guidance / Documents:

- Car Parking Standards
- Maldon District Design Guide (MDDG)
- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)

5. MAIN CONSIDERATIONS

5.1 Principle of Development

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, Section 70(2) of the 1990 Act and paragraph 47 of the NPPF require that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. In this case the development plan comprises of the approved MDLDP.

5.1.2 Policies S1, S2 and S8 of the approved MDMDLDP seek to support sustainable developments within the defined settlement boundaries. This is to ensure that the countryside will be protected for its landscape, natural resources and ecological value as well as its intrinsic character and beauty. It is clearly stated that outside of the defined settlement boundaries, Garden Suburbs and Strategic Allocations, planning permission for development will only be granted where the intrinsic character and beauty of the countryside is not adversely impacted upon and provided that the development falls within one of thirteen specific, defined categories. This list of acceptable development includes, under stipulation g, *'Agricultural and essential workers' accommodation (in accordance with Policy H7)*.

5.1.3 Policy H7 states:

'Permanent or temporary accommodation in the countryside related to and located in the immediate vicinity of a rural enterprise, will only be permitted where:

- 1) Evidence has been submitted to the satisfaction of the Council that there is an existing agricultural, forestry, fishery or other commercial equine business-related functional need for a full-time worker in that location;*
- 2) There are no suitable alternative dwellings available, or which could be made available in the area to serve the identified functional need;*
- 3) It can be demonstrated that the enterprise is, or will be in the case of new businesses, a viable business with secure future prospects;*
- 4) The size and nature of the proposed structure is commensurate with the needs of the enterprise concerned; and*
- 5) The development is not intrusive to the countryside, is designed to minimise adverse impact upon the character and appearance of the area, and is acceptable when considered against other planning requirements.*

In addition to the above requirements, where on-site accommodation is essential to support a new agricultural or forestry or other rural business-related enterprise, permission will only be granted in the first instance for a temporary structure which can easily be removed within three years of the date of planning consent. Any further proposals following this period will be considered using the criteria above.'

- 5.1.4 In relation to stipulations 1 and 2, at the time of the previous application for the retention of caravans for seasonal workers, it was considered that it had not been demonstrated that there was a functional need for the workers at the site (as outlined in blue on the submitted location plan). The following has been provided within the submitted planning statement, it is stated:

'..the increase in the amount of meat to be processed during the shooting seasons is very significant and cannot be dealt with by existing permanent staff. As a consequence additional boners, skinners, and filleters must be employed to cope with the extra work. This is unavoidable. However, because the work is only temporary it is not attractive to UK residents, who if skilled or semi-skilled butchers, will inevitably have a full-time job already elsewhere in the country. Accordingly, it should not be in dispute that additional, temporary, seasonal staff are required from beyond the UK' A timetable of the Gamebird and Waterfowl, Ground Game and Deer open seasons has been supplied to substantiate this.

- 5.1.5 Whilst the need for the workers was not and is not disputed, the need for the accommodation to be located at the site formed part of the Councils reason for refusal and this was upheld by the Planning Inspector. The appellant has provided the following justification for the need of the seasonal workers to be located at the site:

- The staff need to be immediately available to work shifts if a consignment of meat arrives outside normal hours or at short notice. The staff do not have cars and the site is inaccessible by public transport.
- It is the desire of the seasonal staff to save as much money as possible whilst in the UK.
- It is a simple fact that Ben Rigby Game Ltd will struggle to recruit seasonal staff in the future if it cannot offer accommodation on site or conveniently located to it because it is competing for labour with other rural enterprises across the UK.

There may be accommodation available to rent in surrounding villages and towns which, in an abstract sense, could be occupied by seasonal staff. However, references and deposits would have to be provided and this would require considerable pre-planning and collaboration on the part of the potential occupiers/workers before coming to the UK and in any case, there is no affordable way for staff to reach their place of work without a car.

- The cost of renting a dwelling, even if shared is also expensive and far more so that the free or subsidised caravan accommodation found in other southern UK agricultural and rural enterprises. Therefore, there is no suitable accommodation nearby that can meet the needs of Ben Rigby Game Ltd and the expectations of seasonal staff required to make the business function.

5.1.6 The personal circumstances of the potential seasonal workers is not considered to amount to justification for six dwellings at the application site. A similar argument was put forward at the time of the appeal and the Planning Inspector stated: *'In this case the appellant puts forward that there is a business-related, functional need for an additional 20 butchers to work throughout the shooting season. He currently employs 21 permanent butchers who fillet, skin and bone carcasses but he does not detail where they live in relation to the site. At the height of the season the butchers have to be available to work a 24 hour shift pattern to handle the high number of carcasses that arrive from the game estates at all times of the day and night and that is why the seasonal butchers need to be on site. However, no evidence is provided as to why suitable accommodation is not available in the area other than a statement that seasonal workers cannot afford to rent accommodation in the area and that there are no local bus routes that serve the site. In addition, there is no explanation as to why, if there is a need for 20 additional butchers, the caravans appear only to provide accommodation for ten butchers.'* It is not considered that the evidence submitted with this application overcomes the previous reason for refusal in this respect.

5.1.7 In respect of stipulation 3, no concerns with regards to the viability of the business were raised at the time of the previous application (17/00962), it did not form part of the Councils reason for refusal and the Inspector for the appeal concluded in their decision:

'Whilst no specific evidence has been provided to demonstrate viability, it appears from the detailed description of the operation and the investment made in the buildings, such as the new "Box" building, that the business is viable.'

5.1.8 The requirement of criteria 4 of policy H7 is that the proposed structure is commensurate with the needs of the enterprise. In this case it is stated that the proposed dwellings would be utilised by up to 24 seasonal staff members, four workers to a dwelling. It is considered that the two bedroomed dwellings are of a size and nature appropriate to meet specified needs of the enterprise. However, the need has not been backed up by sufficient justification or evidence to satisfy this point.

5.1.9 Moving on to criteria 5 of policy H7, the requirement is that "the development is not intrusive to the countryside, is designed to minimise adverse impact upon the character and appearance of the area and is acceptable when considered against other planning requirements." The visual impact of the proposed dwellings will be assessed further below, but as far as is relevant to this policy, it is considered that it cannot be

argued that the proposed dwellings have been “designed to minimise adverse impact upon the character and appearance of the area” especially given that the height of the proposed dwellings has increased from the dwelling currently present on site and the siting of the dwelling in close proximity to the highway.

- 5.1.10 Given the above assessment, it is not considered that the proposed development is in compliance with policy H7 of the Maldon District Local Development Plan and therefore the proposal is not supported in principle.

5.2 Design and Impact on the Character of the Area

- 5.2.1 The planning system promotes high quality development through good inclusive design and layout, and the creation of safe, sustainable, liveable and mixed communities. Good design should be indivisible from good planning. Recognised principles of good design seek to create a high quality built environment for all types of development.

- 5.2.2 It should be noted that good design is fundamental to high quality new development and its importance is reflected in the NPPF. The NPPF states that:

5.2.3 *“The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”.*

5.2.4 *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”.*

- 5.2.5 This principle has been reflected to the approved MDLDP. The basis of policy D1 of the approved MDLDP seeks to ensure that all development will respect and enhance the character and local context and make a positive contribution in terms of:-

‘Architectural style, use of materials, detailed design features and construction methods. Innovative design and construction solutions will be considered where appropriate;

Height, size, scale, form, massing and proportion;

Landscape setting, townscape setting and skylines;

Layout, orientation, and density;

Historic environment particularly in relation to designated and non-designated heritage assets;

Natural environment particularly in relation to designated and non-designated sites of biodiversity / geodiversity value; and

Energy and resource efficiency’.

- 5.2.6 Similar support for high quality design and the appropriate layout, scale and detailing of development is found within the MDDG.

- 5.2.7 The application site lies outside of any defined development boundary. According to policies S1 and S8 of the MDLDP, the countryside will be protected for its landscape, natural resources and ecological value as well as its intrinsic character and beauty. The policies stipulate that outside of the defined settlement boundaries, the Garden

Suburbs and the Strategic Allocations, planning permission for development will only be granted where the intrinsic character and beauty of the countryside is not adversely impacted upon and provided the development is for proposals that are in compliance with policies within the MDLDP, neighbourhood plans and other local planning guidance.

- 5.2.8 In addition, policy H4 requires all development to be design-led and to seek to optimise the use of land having regard, among others, to the location and the setting of the site, and the existing character and density of the surrounding area. The policy also seeks to promote development which maintains, and where possible enhances, the character and sustainability of the original building and the surrounding area; is of an appropriate scale and design that makes a positive contribution to the character of the original building and the surrounding area and where possible enhances the sustainability of the original building; and does not involve the loss of any important landscape, heritage features or ecology interests.
- 5.2.9 The application is outline in nature with matters of access, appearance, scale and layout for consideration, landscaping has been reserved for consideration at a later date.
- 5.2.10 The application site is located within a rural area, characterised by sporadic residential and agricultural development. There is no formal building line and the dwellings within the vicinity of the site are detached and set within spacious plots. Individual design varies. The site is currently occupied by a low level dwelling, with rooms within the roof space. It is simplistic in design and not considered to be a prominent feature within the streetscene. It measures 14m by 10.3m and measures 6.4m to the ridge.
- 5.2.11 The proposed development of three pairs of semi-detached dwellings, a total of six dwellings on the site, is considered to have a significant impact on the character and appearance of the rural area. The dwellings are set in a linear formation and are handed replicas of each other. The built form extends almost the entire width of the plot, with only around 1m between each building. The height of the proposed semi-detached dwellings is over 1m taller than the existing dwellings on site.
- 5.2.12 The cumulative scale, layout and uniform appearance of the proposed development is considered to significantly and demonstrably harm the character and appearance of the rural area. The proposal would result in a prominent and intrusive development which is in stark contrast to the development within the surrounding area. Therefore, it is considered that the proposal is contrary to policy D1 of the MDLDP.

5.3 Impact on Residential Amenity

- 5.3.1 The basis of policy D1 of the approved MDLDP seeks to ensure that development will protect the amenity of its surrounding areas taking into account privacy, overlooking, outlook, noise, smell, light, visual impact, pollution, daylight and sunlight. This is supported by section C07 of the MDDG. Similarly, policy D2 of the approved MDLDP requires all development to minimize all forms of possible pollution including air, land, water, odour, noise and light. Any detrimental impacts and potential risks to the human and natural environment will need to be adequately addressed by appropriate avoidance, alleviation and mitigation measures.

- 5.3.2 There are no residential dwellings immediately adjacent to or opposite the application site, the closest dwelling to the proposed development is 'Redoaks Farm' located on the opposite side of the road. There is a separation distance in excess of 40m dwelling to dwelling with Fambridge Road in between. Therefore, even considering the intensification of the use, it is not considered that the proposed development would result in overlooking, a loss of light or domination to the detriment of the neighbouring occupiers.
- 5.3.3 The Environmental Health team have been consulted and raised concerns in relation to the noise of the business to the rear of the site and the impact this may have on the amenity of the future occupiers of the dwellings. It is noted that the existing use of the site is for residential purposes. However, the proposal would result in an intensification of the use and it is noted that the business is not subject to any planning controls. Therefore, in line with the stance taken by the Planning Inspector for permission 17/00962/FUL a condition requiring a noise assessment to be submitted would be implemented, should the application be approved.

5.4 Access, Parking and Highway Safety

- 5.4.1 Policy T1 of the approved MDLDP seeks to create additional sustainable transport opportunities. Policy T2 aims to create and maintain an accessible environment, requiring development proposals, inter alia, to provide sufficient parking facilities having regard to the Council's adopted parking standards. Similarly, policy D1 of the approved MDLDP seeks to include safe and secure vehicle and cycle parking having regard to the Council's adopted parking standards and maximise connectivity within the development and to the surrounding areas including the provision of high quality and safe pedestrian, cycle and, where appropriate, horse riding routes.
- 5.4.2 The Council's adopted Vehicle Parking Standards SPD contains the parking standards which are expressed as minimum standards. This takes into account Government guidance which recognises that car usage will not be reduced by arbitrarily restricting off street parking spaces. Therefore, whilst the Council maintains an emphasis of promoting sustainable modes of transport and widening the choice, it is recognised that the Maldon District is predominantly rural in nature and there is a higher than average car ownership. Therefore, the minimum parking standards seek to reduce the negative impact unplanned on-street parking can have on the townscape and safety and take into account the availability of public transport and residents' reliance on the car for accessing, employment, everyday services and leisure. The key objectives of the standards is to help create functional developments, whilst maximising opportunities for use of sustainable modes of transport. This will enable people to sustainably and easily carry out their daily travel requirements without an unacceptable detrimental impact on the local road network, or the visual appearance of the development, from excessive and inconsiderate on street parking.
- 5.4.3 The proposal for six two bedroom dwellings which results in a requirement of twelve car parking spaces. Whilst only six spaces have been shown on the proposed plan, it is considered that a condition could be implemented to ensure the adequate amount of parking provision is provided, given the space to the front of the dwellings, it is considered that twelve parking spaces could be easily accommodated.

- 5.4.4 In terms of access it is proposed to close the existing access to the site which is located centrally along the front boundary of the site and utilise the existing access used for 'Ben Rigby Game Ltd' located to the north of the site. The highway authority has been consulted and raised no objection to the proposal. Therefore, no concerns in this respect are raised.

5.5 Private Amenity Space and Landscaping

- 5.5.1 Policy D1 of the approved MDLDP requires all development to provide sufficient and usable private and public amenity spaces, green infrastructure and public open spaces. In addition, the adopted MDDG advises a suitable garden size for each type of dwellinghouse, namely 100m² of private amenity space for dwellings with three or more bedrooms, 50m² for smaller dwellings and 25m² for flats.
- 5.5.2 The proposed development would provide six two bedroom dwellings resulting in a requirement of 50m² of private amenity space per dwelling. Given the nature of the proposal a communal garden area to the rear of the site, which measures 450m² is proposed. This is in excess of the recommended standard. Therefore, no concerns in this respect are raised.

6. Other Matters

European Designated Sites

- 6.1 The application site falls within the 'Zone of Influence' for one or more of the European designated sites scoped into the emerging Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS). This means that residential developments could potentially have a significant effect on the sensitive interest features of these coastal European designated sites, through increased recreational pressure etc.
- 6.2 The development of six dwellings falls below the scale at which bespoke advice is given from Natural England. To accord with NE's requirements and standard advice an Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Habitat Regulation Assessment (HRA) Record has been completed to assess if the development would constitute a 'Likely Significant Effect' (LSE) to a European site in terms of increased recreational disturbance. The findings from HRA Stage 1: Screening Assessment are listed below:

HRA Stage 1: Screening Assessment – Test 1 - the significance test

Is the development within the zone of influence (ZoI) for the Essex Coast RAMS with respect to the below sites? Yes

Does the planning application fall within the following development types? Yes - The planning application relates to six dwellings

Proceed to HRA Stage 2: Appropriate Assessment to assess recreational disturbance impacts on the above designated sites

Test 2 – the integrity test

Is the proposal for 100 houses + (or equivalent)? No

Is the proposal within or directly adjacent to one of the above European designated sites? No.

- 6.3 As the answer is no, it is advised that a proportionate financial contribution should be secured in line with the Essex Coast RAMS requirements. Provided this mitigation is secured, it can be concluded that this planning application will not have an adverse effect on the integrity of the above European sites from recreational disturbance, when considered 'in combination' with other development. Natural England does not need to be re-consulted on this Appropriate Assessment.
- 6.4 It is understood that a County wide SPD is currently in preparation and has not been through public consultation. As such, the Council cannot request a proportionate financial contribution to be secured in line with the Essex Coast RAMS requirements in connection with development proposals at this stage. The application and the HRA must therefore be determined on the basis that no mitigation of the development is available. In this instance, it is considered that it would be disproportionate and unreasonable to require the developer to mitigate the impact of the six dwellings on the protected habitats and in the context that it is not possible to establish what a proportionate contribution may be, it would be unreasonable to refuse the application on the grounds that the proposal has not mitigated the impacts of the development. Notwithstanding the guidance of Natural England, it is considered that the likely impact of six dwellings in this location would not be harmful in terms of additional residential activity to a degree that would justify the application being refused.

7. ANY RELEVANT SITE HISTORY

- **FUL/MAL/12/01067** – Demolition of existing bungalow, erection of new retail shop with office and freezer stores, four two bedroom flats above including private parking for flats, public parking for shop and new widened access from main road. – REFUSED [07.03.2013]
- **FUL/MAL/13/00419** – Demolition of existing bungalow, erection of new retail shop with office and general stores, four two bedroom flats above including private parking for flats, public parking for shop and new widened access from main road. – APPROVED [02.07.2013]
- **FUL/MAL/17/00962** - Retain use of land for the stationing of caravans to accommodate temporary workers, ancillary to meat preparation, packing and storage and distribution premises. – REFUSE [19.12.2017] and APPEAL DISMISSED [12.11.2018]

8. CONSULTATIONS AND REPRESENTATIONS RECEIVED

8.1 Statutory Consultees and Other Organisations

Name of Statutory Consultee / Other Organisation	Comment	Officer Response
County Highways	No objection subject to conditions.	Noted.
Natural England	Site falls within zone of influence.	Noted. Please see section 6 of this report.

8.2 Internal Consultees

Name of Internal Consultee	Comment	Officer Response
Environmental Health	Noise concerns.	Discussed within section 5.3 of this report.

9. REASONS FOR REFUSAL

- 1 The application site lies within a rural location outside of the defined settlement boundaries where policies of restraint apply. The Council can demonstrate a five year housing land supply to accord with the requirements of the National Planning Policy Framework. The site has not been identified by the Council for development to meet future needs for the District and does not fall within either a Garden Suburb or Strategic Allocation for growth identified within the Maldon District Local Development Plan to meet the objectively assessed needs for housing in the District. The provision of six dwellings in the form of three pairs of semi-detached dwellings would be in stark contrast with development present within the area and would substantially and demonstrably alter the character of the site and rural area and have an unjustified visual impact on the countryside. Further, insufficient information has been submitted to demonstrate the functional need to house seasonal workers, in this location and therefore, the development would be unacceptable and contrary to policies S1, S2, S8, D1, H4 and H7 of the Maldon District Local Development Plan (2017) and Government advice contained within the National Planning Policy Framework (2019).